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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 VICTOR RAMONE WRIGHT,
15 Defendant.

Case No. 2:21-cr-00024-APG-DJA

**STIPULATION TO CONTINUE
OBJECTIONS TO REPORT AND
RECOMMENDATION [ECF NO. 86]
TO DEFENDANT'S MOTION TO
SUPPRESS [ECF. NO 55]**
(First Request)

17
18 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
19 United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, counsel for
20 the United Stated of America, and Rene L. Valladares, Federal Public Defender, and
21 Nisha Brooks-Whittington, Assistant Federal Public Defender, counsel for Victor Ramone
22 Wright, that the Objection deadline to the Report and Recommendation (ECF No. 86) to
23 Defendant's Motion to Suppress (ECF No. 55) currently set for August 29, 2023, be vacated
24 and continued and reset to September 12, 2023.
25
26

The Stipulation is entered into for the following reasons:

1. Defense counsel is out of the jurisdiction from August 22 – 25, 2023, and will need additional time upon her return to prepare and file objections to the Report and Recommendation.

2. The defendant is out of custody and does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsels for the defense sufficient time to prepare and file objections to the Report and Recommendation.

This is the first stipulation to continue filed herein.

DATED this 22nd day of August 2023.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

/s/ Nisha Brooks-Whittington
By _____
NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender

/s/ Daniel J. Cowhig
By _____
DANIEL J. COWHIG
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 VICTOR RAMONE WRIGHT,

7 Defendant.

Case No. 2:21-cr-00024-APG-DJA

ORDER

9 Based on the stipulation and good cause appearing,

10 IT IS THEREFORE ORDERED that the Objections to the Report and Recommendation
11 currently due on August 29, 2023; be filed and continued to September 12, 2023.

12 DATED this 23rd day of August 2023.



13 _____
14 UNITED STATES DISTRICT JUDGE